

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and the Chapter 7 Estate of  
Bernard L. Madoff,

Plaintiff,

v.

NATIONAL BANK OF KUWAIT S.A.K.  
and NBK BANQUE PRIVÉE (SUISSE)  
S.A.,

Defendants.

Adv. Pro. No. 11-02554 (CGM)

**STIPULATION AND ORDER  
TO EXTEND INITIAL DISCLOSURE DEADLINE**

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC, under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the estate of Bernard L. Madoff, under Chapter 7 of the United States Bankruptcy Code, 11 U.S.C. §§ 701-784, and defendants National Bank of Kuwait S.A.K. (“NBK”) and NBK Banque Privée (Suisse) S.A. (“NBK Suisse”) (“Defendants,”

and together with the Trustee, the “Parties”), by and through their respective undersigned counsel, stipulate and agree as follows:

**WHEREAS**, on May 23, 2023, the United States Bankruptcy Court for the Southern District of New York entered a Case Management Plan in this action, which required that the Parties serve initial disclosures on or before July 31, 2023 (the “Initial Disclosure Deadline”) (ECF No. 129); and

**WHEREAS**, the Parties have conferred and agreed to extend the Initial Disclosure Deadline.

**IT IS HEREBY STIPULATED AND AGREED**, by the Parties, and **SO ORDERED**, by the Court:

1. The Initial Disclosure Deadline shall be extended to August 31, 2023.
2. The Parties otherwise reserve all rights, arguments, objections, and defenses they may have, and their entry into this stipulation shall not impair or otherwise affect any such rights, arguments, objections, and defenses.

*[Signatures on following page]*

Dated: July 28, 2023  
New York, New York

By: /s/ Matthew D. Feil  
**Baker & Hostetler LLP**  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Matthew D. Feil  
Email: mfeil@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for  
the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff  
Investment Securities LLC and the  
Chapter 7 Estate of Bernard L. Madoff*

By: /s/ Richard A. Cirillo  
**Richard A. Cirillo, Esq.**  
246 East 33rd Street #1  
New York, New York 10016  
Telephone: (917) 541-6778  
Richard A. Cirillo  
Email: richard@Cirillo-Law.com

*Attorney for Defendants National Bank of  
Kuwait S.A.K. and NBK BANQUE  
PRIVÉE (SUISSE) S.A*

**Dated: August 1, 2023**  
**Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris**  
**U.S. Bankruptcy Judge**